

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO PUBLIC REPRESENTATIVE INSTITUTIONAL INTERROGATORIES
PR/USPS-20 AND 21**

The United States Postal Service hereby provides institutional responses to the above-listed interrogatories of the Public Representative filed September 9, 2011. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE PUBLIC REPRESENTATIVE**

PR/USPS-20

Please provide a revised response to PR/USPS-T1-13 that includes a crosswalk with the information regarding BMEU and Carrier Operations at RAOI facilities provided in USPS-LR-NP6.

RESPONSE

Upon further review of the USPS Library Reference N2011-1/NP6, it is confirmed that approximately 10 percent of the over 2800 RAO Initiative low earned workload post offices have operations that support at least one part-time carrier, and hat none has a BMEU. See USPS Library References N2011-1/21 and N2011-1/NP-14. It is not universally the case that commercial mail is entered only through BMEUs. Accordingly, there are retail facilities without BMEUs that have commercial revenue, which is typically a relatively small component of total operating revenue and relatively insignificant in terms of workload for the Postmaster.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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PR/USPS-21

The following question concerns Operating Revenue and Operating Cost for a post office as detailed in USPS-LR-NP3, Walk in Revenue as detailed in USPS-LR-NP5, and postal operations as detailed in USPS-LR-NP6

- a. What was the FY 2010 Operating Cost and Operating Revenue for the post office as identified in USPS-LR-NP3 row 28799?
- b. What was the FY 2010 walk in revenue for this post office as identified in LR- NP5 row 3434?
- c. What was the earned workload of this office in FY 2010?
- d. According to USPS-LR-NP 6 row 17683:
 - i. What was the EAS level of this office?
 - ii. Does this location have a BMEU
- e. Is the EAS level of this office as identified in USPS-LR-NP6 the same as implied by USPS-LR-2?
- f. If the retail location is closed, will the BMEU move?
- g. How will the co-location of this office with a BMEU impact the discontinuance process?
- h. Is it accurate to infer that the difference between the walk in revenue and the total operating revenue is generated by the BMEU?
- i. What was the cost of offering retail postal services for this location in FY 2010?
- j. What was the cost of operating the BMEU in FY 2010?
- k. Do the costs identified in parts h. and I. equal the total operating cost identified in part a.?
- l. Would the cost savings of discontinuing this location be the costs identified in part a. or part i. or neither? If neither, please provide a calculation of the cost savings associated with discontinuing this location with linked information sources provided in excel format.

RESPONSE

- (a) See USPS Library Reference 2011-1/NP15.
- (b) See USPS Library Reference 2011-1/NP15.
- (c) See USPS Library Reference 2011-1/NP15.
- (d)
 - i. 11.
 - ii. No.

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RESPONSE to DBP/USPS-21 (continued)

- (e) This question needs clarification. Heilwood PA is on row 17,683 of USPS-LR-N2011-1/NP 6 but does not appear in USPS-LR-N2011-1/2.
- (f) The question appears to assume the existence of a BMEU by virtue of the existence of commercial revenue. There are no BMEUs at the 2800 low earned workload RAO Initiative candidate post offices.
- (g) See the responses to subpart (f) and to PR/USPS-20. The existence of commercial revenue, by itself, does signify the presence of a BMEU.
- (h) Not in all cases. See the response to subpart (g).
- (i) See USPS Library Reference 2011-1/NP15.
- (j) This office has no BMEU.
- (k) No, because subpart (h) refers to revenue, not costs.
- (l) The cost savings for discontinuing this office would be Total Operating Expenses.